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June 12, 2024

Via ECF

Honorable LaShann DeArcy Hall United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Vesterman v. The Department of Education of the City of New York, et al., 24-cv-02755 (LDH)(VMS)

Dear Judge Hall:

I represent Plaintiff Tiffany Vesterman in this matter and ask the Court to reconsider its prior order denying the request for an extension as untimely. I apologize for not being clear in the initial letter. The Court had granted via order (Between Dkt 7 and Dk 8) the following regarding denying Defendant's initial motion to dismiss: "Plaintiff shall file a response letter no later than June 12, 2024." Thus, respectfully, the Plaintiff's application was timely filed as the request was filed on June 12, 2024, and complied with the Court's order.

The reason for the extension is that Plaintiff's counsel has two ongoing tenured teacher 3020-a trials (NYCDOE v, Sherman and Westbury UFSD v. Abruscato) and thus have been on an administrative trial on Friday, Monday, Tuesday and Wednesday. Thus, it has been impossible to submit her response in the instant matter.

Thus, it is respectfully submitted that the request for this brief extension of time is reasonable.

Thank you for your consideration herein.

Very truly yours,

s/Stewart Karlin STEWART LEE KARLIN, ESQ. CC via ECF to: Madeleine A. Knutson, ACC

